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Attorneys for Plaintiff
NINA REJUSO individually and on behalf
of others similarly situated and aggrieved

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Attorneys for Defendants
BROOKDALE SENIOR LIVING INC.,
BROOKDALE SENIOR LIVING
COMMUNITIES, INC., BROOKDALE LIVING
COMMUNITIES, INC., and BKD PERSONAL
ASSISTANCE SERVICES, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NINA REJUSO individually and on behalf
of others similarly situated and aggrieved

Plaintiff

v.

BROOKDALE SENIOR LIVING
COMMUNITIES, INC. a Delaware
corporation; BROOKDALE SENIOR
LIVING, INC. a Delaware corporation;
BROOKDALE LIVING COMMUNITIES,
INC. a Delaware corporation; BKD
PERSONAL ASSISTANCE SERVICES,
LLC, a Delaware limited liability company,
and DOES 1 through 50, inclusive,

Defendants

) Case No. 2:17-cv-05227 DMG (RAOx)

)
)
) **JOINT STIPULATION FOR**
) **DISMISSAL PURSUANT TO**
) **FEDERAL RULE OF CIVIL**
) **PROCEDURE 41(A)**

) [Filed concurrently with [Proposed]
) Order]

) Action Filed:
) Trial Date:

July 17, 2017
None Set

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that Plaintiff NINA REJUSO (“Plaintiff”) and Defendants BROOKDALE SENIOR LIVING INC., BROOKDALE SENIOR LIVING COMMUNITIES, INC., BROOKDALE LIVING COMMUNITIES, INC., and BKD PERSONAL ASSISTANCE SERVICES, LLC (“Defendants”) (collectively, the “Parties”), by and through their respective and undersigned counsel, hereby stipulate pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) as follows:

WHEREAS, on July 14, 2017, Plaintiff filed her complaint in the United States District Court for the Central District of California, Case No. 17-cv-5227-DMG, which included class action claims under the California Labor Code, along with claims under California’s Private Attorneys General Act (the “PAGA Lawsuit”);

WHEREAS, on May 22, 2019, the Court granted Defendants’ motion to compel arbitration in the PAGA Lawsuit and ordered Plaintiff’s individual Labor Code claims to arbitration and stayed Plaintiff’s PAGA claim pending completion of the individual arbitration;

WHEREAS, the Parties have agreed to settle any and all claims arising out of Plaintiff’s employment relationship with Defendants;

NOW THEREFORE, subject to approval of the Court, the Parties hereby stipulate and agree that Plaintiff’s individual claims shall be dismissed with prejudice and Plaintiff’s PAGA claim shall be dismissed without prejudice.

IT IS SO STIPULATED.

DATED: October 22, 2020

Respectfully Submitted,

MATERN LAW GROUP, PC

By: /s/ Neil M. Larsen
MATTHEW J. MATERN
JOSHUA D. BOXER
NEIL M. LARSEN

Attorneys for Plaintiff
NINA REJUSO individually and on behalf
of others similarly situated and aggrieved

DATED: October 22, 2020

LITTLER MENDELSON, P.C.

By: /s/ Shannon R. Boyce
SHANNON R. BOYCE

Attorneys for Defendants
BROOKDALE SENIOR LIVING INC.,
BROOKDALE SENIOR LIVING
COMMUNITIES, INC., BROOKDALE
LIVING COMMUNITIES, INC., and BKD
PERSONAL ASSISTANCE SERVICES,
LLC

SIGNATURE ATTESTATION

I, Shannon R. Boyce, am the ECF User whose identification and password are being used to file this Joint Stipulation. In compliance with Local Rule 5-4.3.4, I hereby attest that all signatories hereto concurred in and authorized this filing.

/s/ Shannon R. Boyce

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